

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: May 23, 2024 at 10:00 A.M. ET

Objection Deadline: May 7, 2024 at 4:00 P.M. ET

Ref. Nos. 11885 & 11892

**CERTIFICATION OF COUNSEL REGARDING
DEBTORS' TWENTY-FIFTH (SUBSTANTIVE) OMNIBUS OBJECTION TO
CERTAIN OVERSTATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Kimberly A. Brown, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On April 15, 2024, the Debtors filed the *Debtors' Twenty-Fifth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)* [D.I. 11885, sealed & 11892, redacted] (the “Objection”).

2. Pursuant to the *Notice of Objection* attached to the Objection [D.I. 11885-1 & 11892-1], any responses to the Objection were to be filed no later than May 7, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The Debtors received informal responses (the “Informal Responses”) to the Objection from the holders of claim number 91078, claim number 57506, claim number 87757,

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

and claim number 91933.

4. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the Debtors.

5. The Debtors have resolved the Informal Response from the holder of claim number 70855 with no changes to the proposed form of order attached to the Objection (the “Proposed Order”).

6. The parties have agreed to adjourn the Objection with regard to proofs of claim numbers 91078, 57506, 87757, and 91933.

7. The Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as Exhibit A, to reflect the adjournments. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as Exhibit B. The Revised Order has been circulated to the Office of the United States Trustee (the “U.S. Trustee”) and the Official Committee of Unsecured Creditors (the “Committee”). The Committee has no objection and the U.S. Trustee takes no position with regard to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

8. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: May 23, 2024
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession